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By ECF

November 9, 2018

Honorable Gregory H. Woods  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Re: Case No. 16-cr-00680-GHW, U.S. v. Madrid

Dear Judge Woods:

The status conference date in the above-referenced matter is currently scheduled for November 19, 2018. The defense is requesting that the conference date be adjourned until a date in February of 2019, to give undersigned counsel additional time to review the voluminous discovery. The Government is not opposing this request.

We have consulted with our clients, Sinohe Araujo Meza and Cornelio Cazarez, and they do consent to an exclusion of time under the Speedy Trial Act because the ends of justice are best served by the added delay to ensure that defense counsel can effectively review the discovery in order to prepare for trial or a resolution of this case and these concerns outweigh the best interests of the public and the defendants to a speedy trial. See 18 U.S.C. §3161(h)(7)(A).

Respectfully submitted,  
/s/  
Jan Edward Ronis,  
Gretchen C. von Helms,  
Guadalupe Valencia

cc: Assistant United States Attorney, Rebekah Allen Donaleski (By ECF and email)